



FILED ELECTRONICALLY

September 4, 2002

Lori Wright, Associate Counsel
Federal Advocacy
WorldCom, Inc.
1133 19th Street, N.W. 20036

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**RE: *In the Matter of Qwest Communications International, Inc.
Consolidated Application for Authority to Provide In-Region,
InterLATA Services in Colorado, Idaho, Iowa, Nebraska, and North
Dakota, WC Docket No. 02-148***

***In the Matter of Qwest Communications International, Inc.
Consolidated Application for Authority to Provide In-Region,
InterLATA Services in Montana, Utah, Washington, and Wyoming,
WC Docket No. 02-189***

Dear Ms. Dortch:

It is a week before this Commission is scheduled to rule on Qwest's first multi-state section 271 application and new issues continue to surface. Just two weeks ago, the FCC asked parties to file comments on secret deals only recently revealed by Qwest. On Friday, the FCC asked parties to file comments today on Qwest's recent statements that it cannot certify that the accounts of Qwest or its affiliate are maintained in accordance with generally accepted accounting principles ("GAAP"). And new evidence continues to arise concerning the deficiencies in Qwest's OSS – particularly evidence from Eschelon, a CLEC with significant amounts of experience with Qwest's OSS that was prohibited by a secret deal with Qwest from raising these issues earlier in the section 271 process.¹ Many important issues have been raised in the final days of the 90-day process. There has been too little time for parties to adequately respond to the issues, and too little time for this Commission to fully consider their import. Only by adopting an approve first, ask questions later approach could the Commission possibly grant Qwest's applications.

¹ See, e.g., Eschelon Ex Parte Comments, WC Docket No. 02-148, filed Aug. 15, 2002.

Qwest states that it cannot certify its financial statements or that of its affiliate until its pending accounting review is completed.² While this is understandable, the accounting requirements of section 271 and 272 exist for good reason and provide important competitive protections. Until this issue and outstanding issues with regard to secret deals and Qwest's OSS are resolved, Qwest's applications should be denied.

Please contact me if you have any questions about this matter.

Sincerely,

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Lori Wright
(202) 736-6468

cc: C. Libertelli, M. Desai, J. Goldstein, M. Brill, W. Maher, C. Matthey, E. Yockus, M. Carowitz, G. Remondino, J. Myles, J. Jewel, P. Baker, C. Post, B. Smith, ND PSC, R. Harsch, S. Vick, UT PSC, WA UTC, S. Oxley

² Letter from R. Steven Davis, Qwest, to Marlene H. Dortch, FCC, *In the Matter of Application by Qwest Communications International, Inc. for Authorization to Provide In-Region InterLATA Services in Colorado, Idaho, Iowa, Nebraska, and North Dakota*, WC Docket No. 02-148, and *In the Matter of Application by Qwest Communications International, Inc. for Authorization to Provide In-Region InterLATA Services in Montana, Utah, Washington, and Wyoming*, WC Docket No. 02-189, filed Aug. 26, 2002 at 3.